

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: MONICA BORJA , aka Monica Borja-Rubio, aka Monica Rubio, Debtor(s)	: : : :	Chapter 13 Case No.: 22-10001-pmm
PARAMOUNT RESIDENTIAL MORTGAGE GROUP, Inc. , Movant(s), v.	: : :	Motion for Relief from Stay
MONICA BORJA, ROGER G. BORJA, Co-Debtor and SCOTT F. WATERMAN, TRUSTEE , Respondent(s),	: : :	

**ANSWER TO MOTION OF
PARAMOUNT RESIDENTIAL MORTGAGE GROUP FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **MONICA BORJA**, by and through their attorneys, FISHER CHRISTMAN, and in Answer to the Motion of **PARAMOUNT RESIDENTIAL MORTGAGE GROUP** for Relief from Stay aver:

1. Admitted.
2. Denied. Upon information and belief, Debtor owns all equitable interest in 913 Constitution Avenue, Pen Argyl, Northampton County, Pennsylvania (“the Property.”)
3. Denied to the extent the documents referenced do not speak for themselves.
4. Denied. Upon information and believe, the Trustee was appointed by the United States Trustee.
5. Denied to the extent the averments of paragraph 5 are other than a statement of conclusion of law or misplaced request for relief that does not require a response.
6. Admitted in part and Denied in part. Debtor’s mother passed away after the case was filed, which resulted in a default in postpetition payments. Debtor anticipates being able to cure the default either directly or through a Chapter 13 Plan. Debtor lacks sufficient information and belief to Admit or Deny the exact arrears and such are therefore Denied.

7. Denied. Upon information and belief, applicable law does not allow recoupment of bankruptcy attorneys' fees from Debtor.

8. Denied. Debtor lacks sufficient information and belief to Admit or Deny the exact amount of arrears and such are therefore Denied.

9. Denied to the extent the averments of paragraph 9 are other than a statement of conclusion of law or misplaced request for relief that does not require a response.

10. Denied to the extent the averments of paragraph 10 are other than a statement of conclusion of law or misplaced request for relief that does not require a response. Movant may be entitled to an adequate protection order.

WHEREFORE, Debtor(s) **MONICA BORJA** respectfully pray(s) this Honorable Court for an Order than the Motion of **PARAMOUNT RESIDENTIAL MORTGAGE GROUP** for Relief from Stay be Denied, or, in the alternative, for an adequate protection order, and for such other and further relief as the Honorable Court deems just and appropriate.

/s/ J. Zac Christman

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